

**McGovern Legal Services, LLC**  
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**ATTORNEYS FOR SIXTY ACRE RESERVE CONDOMINIUM ASSOCIATION, INC.**

In re:

**JOSEPH LOMBARDI**

Debtor.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
IN PROCEEDINGS UNDER CHAPTER 13  
OF THE BANKRUPTCY CODE

CASE NO.: 19-25502-MBK

**OBJECTION TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN**

Creditor, Sixty Acre Reserve Condominium Association, Inc. (the "Association"), by and through its counsel, McGovern Legal Services, LLC, hereby submits this objection to Debtor's plan of reorganization under Chapter 13 of the Bankruptcy Code. The Association's objection includes, but is not limited to the following:

**I. THE PROPOSED PLAN DOES NOT INCLUDE PAYMENT OF THE ASSOCIATION'S ENTIRE SECURED CLAIM.**

Debtor's proposed Chapter 13 Plan fails to properly identify and treat the Association's \$11,196.68 secured claim. The Association's proof of claim was timely filed on August 28, 2019. The Debtor's Chapter 13 plan does not propose to pay the Association its entire \$11,196.68 secured claim. As a result, the Association objects to confirmation of Debtor's Plan.

Respectfully submitted,  
McGovern Legal Services, LLC

Date: August 28, 2019

By: /s/Marlena S. Diaz-Cobo  
MARLENA S. DIAZ-COBO, ESQ.

**CERTIFICATION OF SERVICE**

I, Marlena S. Diaz-Cobo, Esq., certify and state that this document was served upon the individuals and/or entities listed below by electronic mail on August 28, 2019. I am aware that if any of the statements made herein are willfully false, I am subject to punishment.

Respectfully submitted,  
McGovern Legal Services, LLC

Date: August 28, 2019

By: /s/Marlena S. Diaz-Cobo  
MARLENA S. DIAZ-COBO, ESQ.

**SERVICE LIST**

**Via Electronic Service:**

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TRUSTEE  
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Office of the US Trustee  
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